

# **EXHIBIT 4**

# WILLKIE FARR & GALLAGHER<sub>LLP</sub>

1875 K St., N.W.  
Washington, DC 20006  
Tel: (202) 303-1000  
Fax: (202) 303-2000

## VIA EMAIL

August 30, 2017

Louis M. Solomon  
Greenberg Traurig, LLP  
200 Park Avenue  
New York, New York 10166

Re: *BSG Resources (Guinea) Limited, et al. v. Soros et al.*, No. 1:17-cv-02726 (JFK) (AJP)

Dear Counsel:

We write further to your correspondence of August 23, 2017, and August 27, 2017, and in response to our meet and confers on August 24, August 28, and August 29, 2017, in the above-referenced matter.

In summary fashion, the below provides information you requested and addresses various issues you raised. By providing this information, we are not waiving any of our asserted objections, and we reserve all rights.

### **“Iron Ore Mining in Guinea”**

You asked us to clarify whether we are withholding documents on the basis of General Objection No. 1 where our specific Responses to certain Requests did not contain a limitation for iron ore mining activities in Guinea. We agreed to re-review those Requests. Upon further review, we are not intending to withhold any documents on the basis of General Objection No. 1 unless otherwise stated in our specific Responses and Objections, except for OSF Request Nos. 44 and 97 and Soros Request Nos. 42 and 95.

### **“Plaintiffs” Iron Ore Mining in Guinea**

Upon re-review, we will not limit production of responsive, non-privileged documents to Plaintiffs’ iron ore mining activities in Guinea with respect to OSF Request Nos. 25, 26, 66, 86, 88, and 95 or Soros Request Nos. 23, 24, 64, 84, 86, and 93. However, we are maintaining our limitation to iron ore mining activities in Guinea for these requests.

### **Objection to Phrase “Iron Ore Mining in Guinea”**

We agreed to re-review the Requests where we objected to your use of the phrase iron ore mining in Guinea. We have done so; we withdraw our objection with respect to OSF Request Nos. 57, 58, and 60 and Soros Request Nos. 55, 56, and 58.

### **Search Terms**

As agreed, we provided modified search terms earlier today. However, as discussed, we have not agreed to produce all documents hitting on those search terms. Rather, we will assess both burden and relevance objections depending on the hit results. As that modified list of search terms reflects, we have included terms for all organizations identified in OSF Request No. 38 and Soros Request No. 36, Sable Mining as identified in OSF Request No. 51 and Soros Request No. 49, and Condé and Obama as identified in OSF Request No. 91 and Soros Request No. 89.

We are in receipt of your letter of today identifying the names of government officials and mining executives Plaintiffs would like us to search. We will include those names as search terms as well.

### **Custodians**

As discussed on Monday, the following are the custodians whose documents we will search:

1. George Soros
2. Chris Canavan
3. Melissa Bukuru
4. Kim Forepaugh
5. Akwe Amosu
6. Obiageli Ezekwesili
7. Stewart Paperin
8. Abdul Tejan-Cole
9. Aryeh Neier
10. Dawn Page
11. Michael Vachon
12. Alexander Soros
13. Jonathan Soros
14. Robert Soros

In your letter of today, you identify the “affiliation” for custodians 5-10 as “Open Society Foundations.” While these individuals are (or were) associated with the network of Open Society Foundations, they are (or were) employees or contractors of Open Society Institute.

Further, to clarify a couple of points from your letter of today regarding Defendants’ custodians, first, we did not agree to specify which individual was from each organization, but rather to confirm that files for each Defendant would be searched for responsive documents. This list of custodians includes representatives from each of the named Defendants. Second, we maintain our objection that most of the entities are not proper parties, but we are not withholding responsive documents or limiting custodians on the basis of this objection.

**Date Range**

Defendants agree to a January 1, 2005, through April 14, 2017, date range. As discussed, to the extent that this date range includes any documents that were created, dated, modified, backdated, or forward-dated during this time period or, to the extent undated, that relate to this time period, they should be included in the parties' productions.

**Scope of Searches Regarding Steinmetz-Soros Relationship**

Defendants agree not to limit documents concerning Plaintiffs or Beny Steinmetz to iron ore mining activities in Guinea – consistent with your agreement not to limit documents concerning Defendants – to iron ore mining activities in Guinea.

**Scope of Searches Regarding the Organizational Structure Among the OSF Entities and Other Entities, such as Global Witness**

Defendants agree to search for documents responsive to OSF Request Nos. 1 and 39 and Soros Request No. 37 without limiting the production to iron ore mining activities in Guinea. Otherwise, Defendants maintain their objections.

We are in the process of identifying custodians or sources of data for these requests and will get back to you.

**Interrogatory Responses**

We agreed to provide the contact information for individuals identified in Defendants' Responses and Objections to Plaintiffs' First Set of Interrogatories, dated August 18, 2017, who were not previously identified pursuant to FRCP 26(a)(1):

<b>Name</b>	<b>Address/Telephone Number</b>
Kim Forepaugh (Assistant to George Soros)	Contact through counsel: Benjamin P. McCallen Willkie Farr & Gallagher LLP 787 7th Ave New York, NY 10019 (212) 728-8000 bmccallen@willkie.com
Aryeh Neier (former President of OSF entities)	Contact through counsel: Benjamin P. McCallen Willkie Farr & Gallagher LLP 787 7th Ave New York, NY 10019 (212) 728-8000 bmccallen@willkie.com

Name	Address/Telephone Number
Dawn Page (Grants Officer during the relevant date range)	Contact through counsel: Benjamin P. McCallen Willkie Farr & Gallagher LLP 787 7th Ave New York, NY 10019 (212) 728-8000 bmccallen@willkie.com
Alexander Soros	Contact through counsel: Benjamin P. McCallen Willkie Farr & Gallagher LLP 787 7th Ave New York, NY 10019 (212) 728-8000 bmccallen@willkie.com
Jonathan Soros	Contact through counsel: Benjamin P. McCallen Willkie Farr & Gallagher LLP 787 7th Ave New York, NY 10019 (212) 728-8000 bmccallen@willkie.com
Robert Soros	Contact through counsel: Benjamin P. McCallen Willkie Farr & Gallagher LLP 787 7th Ave New York, NY 10019 (212) 728-8000 bmccallen@willkie.com

For Obiageli Ezekwesili and Stewart Paperin, we are looking into their last known contact information and will get back to you.

We are looking into your request concerning Kim Forepaugh's tenure as Mr. Soros's assistant and will get back to you as well.

Regards,



Elizabeth J. Bower